

7/25/2016

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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: Wireless Emergency Alerts – Docket # 15-91

Dear Ms. Dortch:

William Hutchinson McClendon, IV, CEO, AC&C, LLC, John Burton Anderson, COO, AC&C, LLC and Christopher Guttman-McCabe, CEO, CGM Advisors, LLC on July 20, 2016 met separately with Daudeline Meme, Office of Commissioner Clyburn, Johanna Thomas, Office of Commissioner Rosenworcel, and Erin McGrath, Office of Commissioner O’Rielly. The purpose of each of the meetings was to discuss the Commission’s Wireless Emergency Alert (WEA) proceeding.

In the meetings, the participants discussed the benefits of the company's device-centric capability and talked at length about how a revenue opportunity could help drive additional investment and innovation into the wireless alerting service. The parties also discussed the ongoing CSRIC process, including the issues surrounding enhanced geo-targeting and geo-fencing of alerts, as well as a definition of “best approximate” in the context of a device-enhanced WEA service.

The discussion centered on two objectives: How to improve the capabilities of WEA and how to increase participation by stake holders (PSAPs/Carriers)

IMPROVE THE CAPABILITIES OF WEA

- Need: Improve geo-targeting (geo-fencing) so that alert originators can deliver alerts in urban and rural areas to any shape and size area, and improve content and personalization of alerts.
- Solution: Device Level Discrimination
 - Benefits:
 - Improves significantly geo-targeting and geo-fencing, allowing an alert message to be delivered in urban AND rural areas to a very focused alert area;

- Creates a revenue opportunity for wireless carriers, as the enhanced geo-targeting will allow for the development of a range of paid offerings;
- Delivers a level of certainty for alert originators, allowing them to have a strong sense of who will receive the message in spite of the differences in network deployments and network technologies;
- Allows for geo targeting of alerts even when the network is compromised in the aftermath of an event;
- Displays the alert on a map, showing where the device exists in the alert area;
- Personalizes the alert message, allowing for different languages if available, and different settings (font size, text to speech, etc.); and,
- Maintains privacy, as the alert remains a one-way service; and,
- Removes the need for a specifically-defined "best approximation" definition in the Commission's rules, as the wireless carrier only needs to deliver to "at least 100% of the alert area, ensuring there is no under-alerting" and allow the device to ensure that there is no over-alerting;

If you have any questions, please feel free to contact me.

Sincerely,

/s/

William Hutchinson McClendon, IV

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